No. 17-886

Arnold Fleck v. Joe Wetch et al.,

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Motion For Leave To File Brief Amicus Curiae and Brief Amicus Curiae of Pacific Legal Foundation In Support of Petitioner contains 4,723 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 18, 2017.

DEBORAH **1**. LAFETRA

 $Counsel\ of\ Record$

Pacific Legal Foundation

930 G Street

Sacramento, California 95814

Telephone: (916) 419-7111

E-mail: DLaFetra@pacificlegal.org

Velorah Joa Tetra

Counsel for Amicus Curiae of Pacific Legal Foundation